

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

**RE: BAY STATE GAS COMPANY
STAFFING AND OTHER MATTERS**

DTE 06-31

**FOURTH SET OF INFORMATION REQUESTS OF INTERVENOR UNITED STEEL,
PAPER AND FORESTRY, RUBBER, MANUFACTURING, ENERGY, ALLIED
INDUSTRIAL AND SERVICE WORKERS INTERNATIONAL UNION ("USW"),
AFL-CIO¹**

USW 4-1: Referring to BSG's response to USW 1-13, state the time period within which Mr. Bryant and Mr. Cote have had "primary responsibility for determining staffing levels for each of Bay State's respective departments." Additionally, list the BSG departments and locations for which Mr. Bryant has primary responsibility for determining staffing levels during the time period identified.

USW 4-2: Referring to BSG's response to USW 1-13, state whether Mr. Bryant has sole or principal decision-making authority, or on the contrary, must gain prior or preliminary approval from an NCSC employee or agent, regarding any of the following types of actions:

- 1) Increasing permanent staffing levels at the BSG Springfield Call Center;
- 2) Hiring temporary employees to increase staffing levels at the BSG Springfield Call Center;
- 3) Instituting layoffs at the Springfield Call Center;
- 4) Contracting with subcontractors to outsource Springfield Call Center functions;

¹ In this request, the term "document" or "documents" means the originals and all non-identical copies (whether different from originals by reason of notations made on such copies or otherwise), or in lieu thereof, true and exact copies, regardless of origin or location, of any written, typed, printed, transcribed, taped, recorded, filmed, punched or graphic matter of any kind, type or nature whatsoever, however produced or reproduced, including but not limited to contracts, proposals, statements and invoices, financial books and records, letters or other correspondence, e-mails, telegrams, telex messages, memoranda and notes of telephone conversations, telephone logs, memoranda and notes of meetings and interviews, inter-office communications, instructions, notes, memoranda, reports, summaries, manuals, magnetic tapes, tabulations, records, work papers, research papers, books, journals, microfiche, microfilm, photographic film, surveys, charts, studies, data sheets, desk calendars and diaries, policies, printed matter, telephone logs, work sheets and working papers and all documentary materials of any nature whatsoever.

The term "identify" means, with respect to a natural person, (1) his or her name; (2) his or her current job title, if still employed by the Company, and whether he or she is employed directly by Bay State Gas or NiSource; (4) his or her current business address and telephone number; and, (5) the name and address of his or her current employer, if not currently employed by the Company.

The term "identify" means, with respect to documents, (1) the author thereof and the person or persons to whom the document(s) was originally directed; (2) the source from whom Complainant obtained such document(s); (3) the date of each such document(s); (4) the current custodian of each such document(s); (5) the location at which each such document(s) is situated; and, (6) the subject matter of each such document(s).

- 5) Hiring permanent full time employees to make up for attrition for the Springfield Call Center and for Meters to Cash; and
- 6) Contracting with subcontractors to outsource Meters to Cash functions at the Springfield BSG offices.

To the extent Mr. Bryant must gain prior/preliminary approval for any of the above actions, state the name of the NCSC employee or agent providing the approval.

- USW 4-3: Referring to BSG's response to USW 1-13, state the time period within which Mr. Bryant and Mr. Cote have been "primarily responsible for determining whether customer-facing functions are outsourced [at BSG]."
- USW 4-4: Referring to BSG's response to USW 1-13, from February 2005 to date, provide all documents relating to, regarding, and informing Mr. Bryant's and Mr. Cote's consideration of whether USW positions performing Call Center and Meters to Cash functions should be outsourced to an outside contractor.
- USW 4-5: To the extent not provided in your response to USW 4-4, identify the individual(s) who made the decision to propose to the USW that all Springfield Call Center and Meters to Cash positions be outsourced shortly after the June 2005 IBM-NCSC Agreement was executed. Additionally, identify the individuals who made the decision to request that the USW bargain over BSG's proposal to outsource all Springfield Call Center and Meters to Cash positions under the June 2005 IBM-NCSC Agreement.
- USW 4-6: Provide all vendor proposals in made response to NCSC's February 2005 RFP (USW 1-14 Confidential Attachment).
- USW 4-7: Referring to your response to USW 1-15, provide the April 28, 2005 announcement and any correspondence to the USW or USW members regarding the same.
- USW 4-8: Referring to your response to USW 1-31, please confirm that no employee or agent of BSG, NCSC, or IBM has performed any analysis of the projected cost savings BSG would realize per annum by outsourcing its customer facing functions consistent with the June 2005 NCSC-IBM Agreement to date. If this is not the case, provide all documents regarding or relating to the cost savings BSG is projected to reap should it adopt the June 2005 NCSC-IBM Agreement's outsourcing provisions.
- USW 4-9: Referring to your supplemental response to USW 1-32:
1) identify the Company employees with whom Mr. Bryant discussed trunk line use and the name of the "supervisor then employed" who "made the

determination to limit the number of calls entering the Springfield Contact Center queues”; and

- 2) Provide the date the new CIS system referred to in his response to USW 1-32 was implemented.

USW 4-10: Referring to your supplemental response to USW 1-32:

- 1) Confirm that BSG and NCSC do not have any documentation regarding the number of trunk lines in place between 1999 and 2001. To the extent this is not the case, provide all available information regarding trunk line capacity during this period.
- 2) Additionally, provide a table addressing trunk line capacity for the Springfield Call Center from July 1, 2002 to the present date.
- 3) Provide the number of calls the Springfield Call Center was able to simultaneously have on its lines directly prior to January 1, 2003 and directly after January 1, 2003 (after the telephone switch was upgraded).
- 4) Provide all evidence supporting your statement that “This enhancement [the new telephone switch], which resulted in the sharing of capacity among the three queues . . . , combined with the movement toward a universal customer service representative model has resulted in a more efficient call center operation.”

Respectfully submitted,

UNITED STEEL, PAPER AND FORESTRY,
RUBBER, MANUFACTURING, ENERGY,
ALLIED INDUSTRIAL AND SERVICE
WORKERS INTERNATIONAL UNION, AFL-
CIO

By its attorneys,

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